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U.S. DISTRICT COURT

2003 JUL 17 A 10:55

Lenora M. Lapidus (LL-6592)  
Women's Rights Project  
American Civil Liberties Union Foundation  
125 Broad Street, 18th Floor  
New York, NY 10004  
212-519-7816  
Attorney for Plaintiffs  
Mei Ying Liu and Shu Fang Chen

FILED

17 2003

AT 9:30 *AM*  
WILLIAM T. WALSH, CLERK

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY

MEI YING LIU and SHU FANG CHEN,  
Plaintiffs,

v.

ORIENTAL BUFFET, INC., d/b/a KING CHEF  
BUFFET; METROPOLITAN BUFFET  
CORPORATION, d/b/a METROPOLITAN  
BUFFET; AN NA ZHENG; XIAO YANG  
ZHENG; BEN LIANG ZHU; FRANK CHAN,  
a/k/a KAI TUNG CHEN, a/k/a KAI TONG  
CHEN, a/k/a KAI CHIANG CHAN, a/k/a KAI  
CHEUNG CHAN, a/k/a KAI CHEONG CHAN;  
and DE GI CHING, a/k/a TEH QI CHING, a/k/a  
JIMMY CHING,

Defendants.

Civil Action No. 03-2406 (KSH)  
Honorable Katharine S. Hayden, U.S.D.J.

AFFIDAVIT OF LEGAL SERVICES  
OF PLAINTIFFS' COUNSEL

LENORA M. LAPIDUS, ESQ., having been duly sworn, states:

1. I am an attorney at law of the State of New Jersey and the Director of the American Civil Liberties Union Foundation - Women's Rights Project, co-counsel for plaintiffs Mei Ying Liu and Shu Fang Chen ("Plaintiffs"). I make this Certification based on firsthand knowledge, and review of documents maintained by Plaintiffs' co-counsel in the ordinary course of business. This Certification is being submitted in support of Plaintiffs' application for an award of attorney fees and costs pursuant to Local Civil Rule 54.2 and

29 U.S.C. § 216(b), 42 U.S.C. § 1988(b), and N.J.S.A. §§ 34:11-56a25, 34:11-56.8, and

10:5-27.1.

2. I am familiar with the attorneys' fees and costs normally allowed by the Court relative to the representation of individuals and entities in various types of litigation, including labor law violations and civil rights actions.

3. Summarized below are the legal services performed by co-counsel in connection with this action:

- a. Meetings with clients;
- b. Research on potential legal claims and possible relief;
- c. Drafting, editing, filing and serving of original Complaint;
- d. Various business name and address searches of Defendants;
- e. Preparation of motion for admission *pro hac vice* and related documents;
- f. Calculation of damages;
- g. Preparation of request for entry of default and motion for default judgment.

4. Detailed computer-generated reports of the services performed, hours billed, and hourly rates of the attorneys, summer associates, and paralegals performing these services are attached as Exhibit A. Note that fees are not being sought for hours associated with amending the complaint or with publicity efforts. A summary of the fees sought follows.

<u>Attorney/Summer Associate/Paralegal</u>	<u>Hours Billed</u>	<u>Hourly Rate</u>	<u>Fees Billed</u>
Jennifer Arnett Lee, Esq.	113.58	\$175 before 7/1/2003, \$195 thereafter	\$20,281.95
Lenora M. Lapidus, Esq.	25.41	\$285 before 7/1/2003, \$300 thereafter	\$7,309.95
Alix R. Rubin, Esq.	93.85	\$225 before 7/1/2003, \$250 thereafter	\$17,253.75
Edward M. Barocas, Esq.	6.5	\$200	\$1,300.00
Michele M. Contreras Sadati, Esq.	4	\$205	\$820.00
Patrick J. Whalen, Esq.	4.55	\$225 before 7/1/2003, \$240 thercarter	\$1,068.00
Amanda Couture, Summer Associate	39.08	\$120	\$4,689.60
Thomas Crawford, Paralegal	4.5	\$90	\$405.00
Katherine E. Taggart, Paralegal	1.6	\$80	\$128.00
<b>TOTAL</b>	<b>293.07</b>		<b>\$53,256.25</b>

5. In connection with the various legal services indicated above, co-counsel has incurred the following litigation costs:

a. Telephone calls	\$25.94
b. Photocopies	\$283.44
c. Facsimiles	\$7.20
d. Filing fees	\$160.50
e. Messenger Service	\$180.25
f. Federal Express	\$45.04
g. Postage	\$26.80
h. Business information searches	\$40.40
i. Serviceon Defendants	\$150.00
j. Lexis research	\$419.02
<b>TOTAL</b>	<b>\$1,338.59</b>

6. It is respectfully requested that this Court allow attorneys' fees of \$53,256.25 to co-counsel, together with out-of-pocket costs of \$1,338.59.

Lenora Lapidus  
Lenora M. Lapidus

Sworn and subscribed to before  
me this \_\_\_\_ day of July, 2003

7/16/03  
Notary Public

Christopher A. Hansen

Christopher A. Hansen  
Notary Public, State of New York  
No. 4948640  
Qualified in Westchester County  
Commission Expires March 20, 2007

2007



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## Selection Criteria

Slip Classification Open  
 Attorney (hand sele Include: Jennifer Arnett  
 Client (hand select) Include: King Chef

Rate Info - identifies rate source and level

Slip ID		Attorney	Units	Rate	Slip Value
Dates and Time		Activity	DNB Time	Rate Info	
Posting Status		Client	Est. Time	Bill Status	
Description		Reference	Variance		
16597	TIME	Jennifer Arnett	0.25	175.00	43.75
11/25/2002	12:00 AM	Telephone	0.00	T@1	
WIP		King Chef	0.00		
E-mail correspondence with Jennifer Ching (attorney familiar with previous King Chef case) regarding: potential for initiating claim.			0.00		
16598	TIME	Jennifer Arnett	0.50	175.00	87.50
11/26/2002	11:54 AM	Telephone	0.00	T@1	
WIP		King Chef	0.00		
E-mail correspondence w/ J. Ching regarding: attorneys previously involved with King Chef plaintiffs.			0.00		
16599	TIME	Jennifer Arnett	0.72	175.00	126.00
12/10/2002		Telephone	0.00	T@1	
WIP		King Chef	0.00		
E-mail corr. w/ J. Ching and Michael Shen (private attorney on first King Chef case) regarding status of original and new cases.			0.00		
16600	TIME	Jennifer Arnett	0.25	175.00	43.75
12/12/2002		Telephone	0.00	T@1	
WIP		King Chef	0.00		
E-mail corr. w/ J. Ching and Megan Lewis (attorney at Urban Justice Center) regarding possibility of filing a claim.			0.00		
16601	TIME	Jennifer Arnett	0.08	175.00	14.00
1/8/2003		Telephone	0.00	T@1	
WIP		King Chef	0.00		
E-mail corr. w/ J. Ching regarding setting up meeting with clients.			0.00		
16592	TIME	Jennifer Arnett	4.00	175.00	700.00
2/24/2003		Meeting	0.00	T@1	
WIP		King Chef	0.00		
Initial meeting with clients to discuss			0.00		

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Slip ID Dates and Time Posting Status Description	Attorney Activity Client Reference	Units DNB Time Est. Time Variance	Rate Rate Info Bill Status	Slip Value
potential case.				
16593 2/24/2003 WIP Write initial memo summarizing facts and potential legal claims of case.	Jennifer Arnett Drafting King Chef	6.00 0.00 0.00 0.00	175.00 T@1	1050.00
16602 3/7/2003 WIP E-mail corr. w/ J. ching regarding status of Dept. of Labor investigation	Jennifer Arnett Telephone King Chef	0.25 0.00 0.00 0.00	175.00 T@1	43.75
16603 3/10/2003 WIP E-mail corr. w/ J. Ching regarding status of Dept. of Labor investigation; phone call to Dept. of Labor regarding same.	Jennifer Arnett Telephone King Chef	0.50 0.00 0.00 0.00	175.00 T@1	87.50
16604 3/28/2003 WIP E-mail corr. w/ J. Ching regarding status of first King Chef case, Ed Barocas (Legal Director of ACLU of New Jersey) regarding possible co-counsel arrangement.	Jennifer Arnett Telephone King Chef	0.33 0.00 0.00 0.00	175.00 T@1	57.75
16605 4/1/2003 WIP E-mail corr. w/ J. Ching regarding; status of first King Chef case, potential co-counsel arrangement; E Barocas regarding potential co-counsel arrangement.	Jennifer Arnett Telephone King Chef	1.00 0.00 0.00 0.00	175.00 T@1	175.00
15944 4/1/2003 WIP Business name search	Jennifer Arnett Research King Chef	0.80 0.00 0.00 0.00	150.00 T	120.00
16606 4/2/2003 WIP E-mail corr. w/ Lenora Lapidus, E. Barocas regarding potential co-counsel arrangements, finding cooperating law firm.	Jennifer Arnett Telephone King Chef	1.00 0.00 0.00 0.00	175.00 T@1	175.00

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Slip ID		Attorney	Units	Rate	Slip Value
Dates and Time		Activity	DNB Time	Rate Info	
Posting Status		Client	Est. Time	Bill Status	
Description		Reference	Variance		
16607	TIME	Jennifer Arnett	0.25	175.00	43.75
4/4/2003		Telephone	0.00	T@1	
WIP		King Chef	0.00		
E-mail corr. w/ E. Barocas, L. Lapidus			0.00		
regarding possible law firm contacts for					
co-counseling.					
16608	TIME	Jennifer Arnett	0.08	175.00	14.00
4/7/2003		Telephone	0.00	T@1	
WIP		King Chef	0.00		
E-mail corr. w/ E. Barocas regarding private			0.00		
attorney cooperation.					
16609	TIME	Jennifer Arnett	0.17	175.00	29.75
4/14/2003		Telephone	0.00	T@1	
WIP		King Chef	0.00		
E-mail corr. w/ E. Barocas regarding:			0.00		
cooperating attorney status.					
16610	TIME	Jennifer Arnett	0.17	175.00	29.75
4/16/2003		Telephone	0.00	T@1	
WIP		King Chef	0.00		
E-mail corr. w/ intern regarding public policy			0.00		
research.					
15954	TIME	Jennifer Arnett	2.48	175.00	434.00
4/16/2003	2:45 PM	Complaint	0.00	T@1	
WIP		King Chef	0.00		
Draft complaint.			0.00		
15955	TIME	Jennifer Arnett	2.75	175.00	481.25
4/17/2003	5:14 PM	Complaint	0.00	T@1	
WIP		King Chef	0.00		
Draft complaint.			0.00		
15958	TIME	Jennifer Arnett	2.48	175.00	434.00
4/18/2003	4:57 PM	Complaint	0.00	T@1	
WIP		King Chef	0.00		
Draft and edit complaint.			0.00		
15961	TIME	Jennifer Arnett	0.75	175.00	131.25
4/23/2003	12:40 PM	Complaint	0.00	T@1	
WIP		King Chef	0.00		
Edit complaint.			0.00		

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Slip ID		Attorney	Units	Rate	Slip Value
Dates and Time		Activity	DNB Time	Rate Info	
Posting Status		Client	Est. Time	Bill Status	
Description		Reference	Variance		
15962	TIME 4/24/2003 2:42 PM WIP Edit complaint.	Jennifer Arnett Complaint King Chef	1.47 0.00 0.00 0.00	175.00 T@1	257.25
16611	TIME 4/24/2003 WIP E-mail corr. w/ E. Barocas regarding draft complaint. Research possibility of public policy claim.	Jennifer Arnett Research King Chef	7.00 0.00 0.00 0.00	175.00 T@1	1225.00
16612	TIME 4/25/2003 WIP E-mail corr. w/ E. Barocas regarding working with Alix Rubin.	Jennifer Arnett Telephone King Chef	0.25 0.00 0.00 0.00	175.00 T@1	43.75
16613	TIME 5/6/2003 WIP E-mail corr. w/ J. Ching regarding public policy claim; preparation of conflicts check	Jennifer Arnett Telephone King Chef	0.75 0.00 0.00 0.00	175.00 T@1	131.25
15963	TIME 5/8/2003 2:20 PM WIP Arrange timing for complaint filing, press conference.	Jennifer Arnett Telephone King Chef	0.33 0.00 0.00 0.00	175.00 T@1	57.75
16614	TIME 5/9/2003 WIP E-mail corr. w/ L. Lapidus and E. Barocas regarding working with A. Rubin, timing for filing of complaint.	Jennifer Arnett Telephone King Chef	0.33 0.00 0.00 0.00	175.00 T@1	57.75
15966	TIME 5/12/2003 4:49 PM WIP Communication with co-counsel about sharing fees and costs.	Jennifer Arnett Fees and Costs King Chef	0.16 0.00 0.00 0.00	175.00 T@1	28.00
15967	TIME 5/12/2003 4:59 PM WIP Query to national list serve about public policy argument.	Jennifer Arnett Research King Chef	0.20 0.00 0.00 0.00	175.00 T@1	35.00

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Slip ID	Dates and Time	Posting Status	Description	Attorney	Units	Rate	Slip Value
				Activity	DNB Time	Rate Info	
				Client	Est. Time	Bill Status	
				Reference	Variance		
15965	TIME 5/12/2003 WIP	4:34 PM	Drafting of retainer agreement.	Jennifer Arnett	0.46	175.00 T@1	80.50
				Drafting	0.00		
				King Chef	0.00		
					0.00		
15968	TIME 5/12/2003 WIP	5:36 PM	Drafting of consent forms, as required by FLSA.	Jennifer Arnett	0.59	175.00 T@1	101.50
				Drafting	0.00		
				King Chef	0.00		
					0.00		
15964	TIME 5/12/2003 WIP	4:24 PM	Edit complaint.	Jennifer Arnett	7.66	175.00 T@1	1340.50
				Complaint	0.00		
				King Chef	0.00		
					0.00		
16615	TIME 5/12/2003 WIP		E-mail corr. w/ A. Rubin regarding co-counsel arrangements; A. Rubin, L. Lapidus, E. Barocas regarding viability of public policy claim, possibility of filing in state court; L. Lapidus regarding FLSA consent forms.	Jennifer Arnett	5.50	175.00 T@1	962.50
				Telephone	0.00		
				King Chef	0.00		
					0.00		
16616	TIME 5/13/2003 WIP		E-mail corr. w/ cooperating attorneys regarding: FLSA consent forms, possibility of filing in state court, revisions to complaint, co-counsel agreement, arrange for conference call.	Jennifer Arnett	2.50	175.00 T@1	437.50
				Telephone	0.00		
				King Chef	0.00		
					0.00		
15979	TIME 5/13/2003 WIP	10:18 AM	Review of local rules for District of New Jersey.	Jennifer Arnett	0.41	175.00 T@1	71.75
				Research	0.00		
				King Chef	0.00		
					0.00		
15980	TIME 5/13/2003 WIP	11:08 AM	FLSA statute of limitations	Jennifer Arnett	0.18	175.00 T@1	31.50
				Research	0.00		
				King Chef	0.00		
					0.00		

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				Activity	DNB Time	Rate Info	
				Client	Est. Time	Bill Status	
				Reference	Variance		
15983	TIME 5/13/2003 12:47 PM	WIP	Drafting of co-counsel agreement.	Jennifer Amett	0.60	175.00	105.00
				Drafting	0.00	T@1	
				King Chef	0.00		
					0.00		
15984	TIME 5/13/2003 1:27 PM	WIP	Comparison of allowable relief under federal and state laws.	Jennifer Amett	0.18	175.00	31.50
				Research	0.00	T@1	
				King Chef	0.00		
					0.00		
16617	TIME 5/14/2003 2:30 AM	WIP	Conference call w/ cooperating attys regarding state vs. federal court, judge assigned to first King Chef case; e-mail corr. regarding same.	Jennifer Amett	1.67	175.00	292.25
				Telephone	0.00	T@1	
				King Chef	0.00		
					0.00		
16618	TIME 5/14/2003	WIP	Discuss King Chef case, media strategy with Richard Alleyne.	Jennifer Amett	0.50	175.00	87.50
				Meeting	0.50	T@1	
				King Chef	0.00	Do Not Bill	
					0.00		
16621	TIME 5/15/2003	WIP	E-mail corr. w/ cooperating attys regarding state vs. federal court; review comments on complaint.	Jennifer Amett	1.50	175.00	262.50
				review	0.00	T@1	
				King Chef	0.00		
					0.00		
16099	TIME 5/15/2003 12:25 PM	WIP	Review, drafting of press release.	Jennifer Amett	0.37	175.00	64.75
				Drafting	0.37	T@1	
				King Chef	0.00	Do Not Bill	
					0.00		
16619	TIME 5/15/2003	WIP	Review draft press release.	Jennifer Amett	0.75	175.00	131.25
				review	0.75	T@1	
				King Chef	0.00	Do Not Bill	
					0.00		
16620	TIME 5/15/2003	WIP	Telephone conversation w/ Chinese Staff and Workers Assn. regarding locating plaintiffs; e-mail corr. w/ cooperating attys	Jennifer Amett	0.67	175.00	117.25
				Telephone	0.00	T@1	
				King Chef	0.00		
					0.00		

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Dates and Time		Activity	DNB Time	Rate Info	
Posting Status		Client	Est. Time	Bill Status	
Description		Reference	Variance		
regarding same.					
16098	TIME 5/16/2003 WIP	Jennifer Arnett Telephone King Chef	0.28 0.00 0.00 0.00	175.00 T@1	49.00
	Conversation with Mike Shen (attorney)--strategy.				
16100	TIME 5/16/2003 WIP	Jennifer Arnett Complaint King Chef	3.28 0.00 0.00 0.00	175.00 T@1	574.00
	Edits to complaint, retainer.				
16101	TIME 5/16/2003 WIP	Jennifer Arnett Meeting King Chef	3.03 0.00 0.00 0.00	175.00 T@1	530.25
	Meeting with clients & interpreter. Review complaint, retainer, media strategy.				
16102	TIME 5/16/2003 WIP	Jennifer Arnett Meeting King Chef	0.05 0.00 0.00 0.00	175.00 T@1	8.75
	Discussion with supervisor, Lenora Lapidus.				
16624	TIME 5/16/2003 WIP	Jennifer Arnett Meeting King Chef	0.33 0.00 0.00 0.00	175.00 T@1	57.75
	E-mail corr. w/ J. Ching regarding wage discrimination claim.				
16088	TIME 5/18/2003 WIP	Jennifer Arnett Travel King Chef	1.58 0.00 0.00 0.00	175.00 T@1	276.50
	round-trip travel from home to Chinese Staff & Workers, for meeting with clients.				
16089	TIME 5/18/2003 WIP	Jennifer Arnett Meeting King Chef	4.75 0.00 0.00 0.00	175.00 T@1	831.25
	Meeting with clients & translator, to discuss complaint, retainer, publicity, etc.				
16084	TIME 5/19/2003 WIP	Jennifer Arnett Pre-filing King Chef	0.20 0.00 0.00 0.00	175.00 T@1	35.00
	Preparation of retainer, consent form for Ah Fang.				

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Slip ID	Dates and Time	Posting Status	Description	Attorney	Units	Rate	Slip Value
				Activity	DNB Time	Rate Info	
				Client	Est. Time	Bill Status	
				Reference	Variance		
16090	TIME 5/19/2003 4:29 PM WIP Drafting of retainer agreements.			Jennifer Arnett	0.04	175.00	7.00
				Drafting	0.00	T@1	
				King Chef	0.00		
					0.00		
16625	TIME 5/19/2003 WIP Final edits to complaint; e-mail corr. regarding immigration status of client, final edits to complaint, co-counsel agreement, preparation of filing papers			Jennifer Arnett	1.33	175.00	232.75
				Drafting	0.00	T@1	
				King Chef	0.00		
					0.00		
16087	TIME 5/19/2003 9:57 AM WIP Update to co-counsel			Jennifer Arnett	0.46	175.00	80.50
				Meeting	0.00	T@1	
				King Chef	0.00		
					0.00		
16107	TIME 5/20/2003 4:57 PM WIP Edits to complaint.	5/21/2003		Jennifer Arnett	2.96	175.00	518.00
				Complaint	0.00	T@1	
				King Chef	0.00		
					0.00		
16105	TIME 5/20/2003 12:18 PM WIP Preparation of civil cover sheet.			Jennifer Arnett	0.19	175.00	33.25
				Pre-filing	0.00	T@1	
				King Chef	0.00		
					0.00		
16104	TIME 5/20/2003 11:26 AM WIP discussion with Wei Chen about updates from clients.			Jennifer Arnett	0.03	175.00	5.25
				Telephone	0.00	T@1	
				King Chef	0.00		
					0.00		
16628	TIME 5/21/2003 WIP Discussion w. A. Rubin regarding filing and service of complaint.			Jennifer Arnett	0.33	175.00	57.75
				Telephone	0.00	T@1	
				King Chef	0.00		
					0.00		
16626	TIME 5/21/2003 WIP Discussion w/ W. Chen regarding final edits to complaint.			Jennifer Arnett	0.75	175.00	131.25
				Telephone	0.00	T@1	
				King Chef	0.00		
					0.00		

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Slip ID		Attorney	Units	Rate	Slip Value
Dates and Time		Activity	DNB Time	Rate Info	
Posting Status		Client	Est. Time	Bill Status	
Description		Reference	Variance		
16629	TIME	Jennifer Arnett	0.33	175.00	57.75
5/22/2003		Telephone	0.00	T@1	
WIP		King Chef	0.00		
Discussion w/ A. Rubin regarding revisions to complaint.			0.00		
16627	TIME	Jennifer Arnett	3.00	175.00	525.00
5/22/2003		Drafting	0.00	T@1	
WIP		King Chef	0.00		
Review of W. Chen's and W. Lam's list of concerns with the complaint, discussion w/ L. Lapidus regarding same.			0.00		
16631	TIME	Jennifer Arnett	0.50	175.00	87.50
6/5/2003		review	0.00	T@1	
WIP		King Chef	0.00		
Review intern memo on successor liability, e-mail corr. regarding same.			0.00		
16254	TIME	Jennifer Arnett	0.44	175.00	77.00
6/5/2003	1:32 PM	Telephone	0.00	T@1	
WIP		King Chef	0.00		
Conversation with cooperating attorney regarding: business searches, finding defendants.			0.00		
16255	TIME	Jennifer Arnett	0.24	175.00	42.00
6/5/2003	2:00 PM	Research	0.00	T@1	
WIP		King Chef	0.00		
Business search for defendants.			0.00		
16630	TIME	Jennifer Arnett	1.33	175.00	232.75
6/5/2003		Telephone	0.00	T@1	
WIP		King Chef	0.00		
Discussion w/ A. Rubin regarding status of filing and service; review of e-mail correspondence between cooperating attys.			0.00		
16632	TIME	Jennifer Arnett	0.75	175.00	131.25
6/6/2003		Telephone	0.00	T@1	
WIP		King Chef	0.00		
E-mail corr. w/ cooperating attys regarding status of searches; telephone discussion w/ A. Rubin regarding same.			0.00		
16633	TIME	Jennifer Arnett	2.00	175.00	350.00
6/9/2003		Telephone	0.00	T@1	
WIP		King Chef	0.00		

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Slip ID	Dates and Time	Posting Status	Description	Attorney	Units	Rate	Slip Value
				Activity	DNB Time	Rate Info	
				Client Reference	Est. Time	Bill Status	
					Variance		
	E-mail corr. w/ cooperating attys regarding potential RICO claim, filing of amended complaint, service of original complaint, location of defendants				0.00		
16310	TIME 6/9/2003 6:10 PM	WIP	Meeting with client and CSWA staff (1 hour), interview with NJ press.	Jennifer Amett Meeting King Chef	2.92 2.92 0.00	175.00 T@1 Do Not Bill	511.00
16285	TIME 6/9/2003 11:30 AM	WIP	Conference call about amending complaint (parties and claims).	Jennifer Amett Telephone King Chef	1.17 1.17 0.00	175.00 T@1 Do Not Bill	204.75
16286	TIME 6/9/2003 12:40 PM	WIP	Call with Wei Chen (CSWA) about defendants' names.	Jennifer Arnett Telephone King Chef	0.25 0.00 0.00	175.00 T@1	43.75
16309	TIME 6/9/2003 6:18 PM	WIP	travel from office to CSWA and back	Jennifer Arnett Travel King Chef	1.00 1.00 0.00	175.00 T@1 Do Not Bill	175.00
16280	TIME 6/9/2003 10:58 AM	WIP	Discussion about civil RICO, prepare for conference call.	Jennifer Arnett Legal King Chef	0.36 0.36 0.00	175.00 T@1 Do Not Bill	63.00
16313	TIME 6/10/2003 12:01 PM	WIP	Conversation about amended complaint.	Jennifer Arnett Telephone King Chef	0.31 0.31 0.00	175.00 T@1 Do Not Bill	54.25
16635	TIME 6/10/2003	WIP	Final edits to amended complaint.	Jennifer Amett Drafting King Chef	0.50 0.50 0.00	175.00 T@1 Do Not Bill	87.50
16634	TIME 6/10/2003	WIP	E-mail corr. w/ cooperating attys, CSWA	Jennifer Amett Telephone King Chef	2.00 0.00 0.00	175.00 T@1	350.00

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Slip ID		Attorney	Units	Rate	Slip Value
Dates and Time		Activity	DNB Time	Rate Info	
Posting Status		Client	Est. Time	Bill Status	
Description		Reference	Variance		
regarding information about "new" restaurant, serving amended and original complaint, edits to amended complaint					
166312	TIME 6/10/2003 WIP	Jennifer Arnett Drafting King Chef	0.07 0.07 0.00 0.00	175.00 T@1 Do Not Bill	12.25
	E-mail to press contact at Herald News.				
16636	TIME 6/11/2003 WIP	Jennifer Arnett Telephone King Chef	0.25 0.25 0.00 0.00	175.00 T@1 Do Not Bill	43.75
	E-mail correspondence regarding filing of amended complaint.				
16637	TIME 6/12/2003 WIP	Jennifer Arnett Telephone King Chef	0.42 0.00 0.00 0.00	175.00 T@1	73.50
	E-mail corr. regarding potential RICO claim, damages, filing amended complaint; review of damages charts				
16639	TIME 6/13/2003 WIP	Jennifer Arnett review King Chef	0.58 0.00 0.00 0.00	175.00 T@1	101.50
	Review of revised damages charts; e-mail corr. regarding same. E-mail w/ A. Rubin about trafficking.				
16638	TIME 6/13/2003 WIP	Jennifer Arnett review King Chef	0.50 0.50 0.00 0.00	175.00 T@1 Do Not Bill	87.50
	Review of press coverage of King Chef case; e-mail corr regarding same.				
16640	TIME 6/16/2003 WIP	Jennifer Arnett Telephone King Chef	0.17 0.00 0.00 0.00	175.00 T@1	29.75
	E-mail corr. regarding status of service.				
16641	TIME 6/17/2003 WIP	Jennifer Arnett Telephone King Chef	0.17 0.00 0.00 0.00	175.00 T@1	29.75
	E-mail corr. regarding status of service, filing proof of service.				

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Slip ID	Attorney	Units	Rate	Slip Value
Dates and Time	Activity	DNB Time	Rate Info	
Posting Status	Client	Est. Time	Bill Status	
Description	Reference	Variance		
16642	Jennifer Arnett	0.50	175.00	87.50
6/18/2003	review	0.00	T@1	
WIP	King Chef	0.00		
Meet with A. Couture to discuss damages charts, review same.		0.00		
16398	Jennifer Arnett	0.31	175.00	54.25
6/19/2003	Legal	0.00	T@1	
WIP	King Chef	0.00		
Preparation of pro hac vice papers.		0.00		
16643	Jennifer Arnett	0.25	175.00	43.75
6/19/2003	Telephone	0.25	T@1	
WIP	King Chef	0.00	Do Not Bill	
E-mail corr. regarding potential RICO claim.		0.00		
16644	Jennifer Arnett	0.33	175.00	57.75
6/20/2003	review	0.00	T@1	
WIP	King Chef	0.00		
Continue review of damages charts.		0.00		
16427	Jennifer Arnett	0.84	175.00	147.00
6/23/2003	4:22 PM	6/24/2003	Legal	
WIP	King Chef	0.00	T@1	
Review of calculation of damages.		0.00		
16645	Jennifer Arnett	0.25	175.00	43.75
6/24/2003	Telephone	0.00	T@1	
WIP	King Chef	0.00		
E-mail corr regarding status of service and trafficking element of case.		0.00		
16646	Jennifer Arnett	1.00	175.00	175.00
6/25/2003	Telephone	0.00	T@1	
WIP	King Chef	0.00		
E-mail corr regarding trafficking element of case, possibility of T-1 visa; discussion of same w. intern, immigration attorney.		0.00		
16505	Jennifer Arnett	1.55	175.00	271.25
6/27/2003	review	1.55	T@1	
WIP	King Chef	0.00	Do Not Bill	
Review research/memorandum on RICO		0.00		

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Slip ID		Attorney	Units	Rate	Slip Value
Dates and Time		Activity	DNB Time	Rate Info	
Posting Status		Client	Est. Time	Bill Status	
Description		Reference	Variance		
16525	TIME	Jennifer Arnett	0.32	175.00	56.00
6/30/2003	5:09 PM	Telephone	0.32	T@1	
WIP		King Chef	0.00	Do Not Bill	
	Talk with reporter from World Journal.		0.00		
16521	TIME	Jennifer Arnett	2.24	195.00	436.80
6/30/2003	3:43 PM	Legal	0.00	T@2	
WIP		King Chef	0.00		
	Preparation of pro hac vice papers.		0.00		
16647	TIME	Jennifer Arnett	0.67	195.00	130.65
7/2/2003		Telephone	0.00	T@2	
WIP		King Chef	0.00		
	E-mail corr w/ cooperating attys regarding filing for default and default judgment.		0.00		
16648	TIME	Jennifer Arnett	0.75	195.00	146.25
7/2/2003		Telephone	0.00	T@2	
WIP		King Chef	0.00		
	E-mail corr w/ cooperating attys regarding order from J. Hayden order to seek default and default judgment.		0.00		
16549	TIME	Jennifer Arnett	0.80	195.00	156.00
7/3/2003	5:02 PM	Drafting	0.00	T@2	
WIP		King Chef	0.00		
	Draft motion for default.		0.00		
16550	TIME	Jennifer Arnett	4.57	195.00	891.15
7/7/2003	10:37 AM	Drafting	0.00	T@2	
WIP		King Chef	0.00		
	Research and draft motion for default judgment.		0.00		
16649	TIME	Jennifer Arnett	0.83	195.00	161.85
7/7/2003		Telephone	0.00	T@2	
WIP		King Chef	0.00		
	E-mail corr regarding default and default judgment.		0.00		
16650	TIME	Jennifer Arnett	1.00	195.00	195.00
7/8/2003		Telephone	0.00	T@2	
WIP		King Chef	0.00		
	Phone discussion w/ W. chen regarding new plaintiff; e-mail corr. regarding same, possibility of amending complaint a second time.		0.00		

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Slip ID		Attorney	Units	Rate	Slip Value
Dates and Time		Activity	DNB Time	Rate Info	
Posting Status		Client	Est. Time	Bill Status	
Description		Reference	Variance		
16651	TIME	Jennifer Arnett	0.25	195.00	48.75
7/9/2003		Telephone	0.25	T@2	
WIP		King Chef	0.00	Do Not Bill	
E-mail corr. regarding statute of limitations for RICO, CFA claims, serving notice of default judgment.			0.00		
16652	TIME	Jennifer Arnett	0.33	195.00	64.35
7/10/2003		Telephone	0.00	T@2	
WIP		King Chef	0.00		
E-mail corr regarding pro hac vice papers, affidavit of legal services, motion for default judgment.			0.00		
16557	TIME	Jennifer Arnett	0.09	195.00	17.55
7/10/2003	2:56 PM	Telephone	0.00	T@2	
WIP		King Chef	0.00		
Conversation with Wei Chen at CSWA about finding defendants.			0.00		
16653	TIME	Jennifer Arnett	0.50	195.00	97.50
7/11/2003		Telephone	0.00	T@2	
WIP		King Chef	0.00		
E-mail corr. regarding pro hac vice papers, default judgment, affidavit of legal services.			0.00		
16594	TIME	Jennifer Arnett	0.17	195.00	33.15
7/11/2003	4:36 PM	Telephone	0.00	T@2	
WIP		King Chef	0.00		
Conversation with co-counsel regarding: whether to seek jury trial or hearing for damages on discrimination and public policy claims.			0.00		
16561	TIME	Jennifer Arnett	1.91	195.00	372.45
7/11/2003	11:47 AM	Drafting	0.00	T@2	
WIP		King Chef	0.00		
Preparation of affidavit of legal services.			0.00		
16591	TIME	Jennifer Arnett	1.96	195.00	382.20
7/11/2003	3:23 PM	7/14/2003	Drafting	0.00	T@2
WIP			King Chef	0.00	
Preparation of affidavit of legal services.			0.00		
16654	TIME	Jennifer Arnett	0.77	195.00	150.15
7/14/2003	2:26 PM	Drafting	0.00	T@2	
WIP		King Chef	0.00		
Continued preparation of affidavit legal			0.00		

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Slip ID		Attorney	Units	Rate	Slip Value
Dates and Time		Activity	DNB Time	Rate Info	
Posting Status		Client	Est. Time	Bill Status	
Description		Reference	Variance		
	services.				
16656	TIME 7/14/2003 4:44 PM WIP	Jennifer Amett review King Chef	0.07 0.00 0.00 0.00	195.00 T@2	13.65
	Review of request for default that was filed.				
16660	TIME 7/15/2003 11:10 AM WIP	Jennifer Amett Legal King Chef	1.95 0.00 0.00 0.00	195.00 T@2	380.25
	Review motion for default judgment and related papers for filing, e-mail co-counsel regarding same, speak with A. Rubin on phone regarding same, edit affidavit of legal services.				
16661	TIME 7/15/2003 3:32 PM WIP	Jennifer Amett review King Chef	0.80 0.00 0.00 0.00	195.00 T@2	156.00
	Review research memo on s. 1981 liability, discuss same w/ S. Terman (summer associate)				
16663	TIME 7/15/2003 6:11 PM WIP	Jennifer Amett Telephone King Chef	0.45 0.00 0.00 0.00	195.00 T@2	87.75
	Speak with W. Chen at Chinese Staff & Workers' Assn. regarding update of case, ethnic differences of Mandarin and Fuchownese people, ideas for serving defendants.				
16670	TIME 7/16/2003 2:06 PM WIP	Jennifer Arnett Legal King Chef	1.50 0.00 0.00 0.00	195.00 T@2	292.50
	Speak with W. Chen about calculations of damages. Finalize calculation of damages. Speak with A. Rubin about filing documents. Attend to filing of motion for default judgment.				
<b>Grand Total</b>					
		Billable	113.58		20281.95
		Unbillable	11.07		1942.25
		Total	124.65		22224.20



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## Selection Criteria

Slip Classification Open  
 Attorney (hand sele) Include: Lenora Lapidus  
 Client (hand select) Include: King Chef

Rate Info - identifies rate source and level

Slip ID		Attorney	Units	Rate	Slip Value
Dates and Time		Activity	DNB Time	Rate Info	
Posting Status		Client	Est. Time	Bill Status	
Description		Reference	Variance		
16722	TIME	Lenora Lapidus	1.60	285.00	456.00
2/24/2003	2:00 AM	review	0.00	T@3	
WIP		King Chef	0.00		
Review memo regarding potential case			0.00		
16721	TIME	Lenora Lapidus	1.10	285.00	313.50
3/19/2003	2:30 AM	Settlement	0.00	T@3	
WIP		King Chef	0.00		
Review memo regarding facts and claims in potential case			0.00		
16724	TIME	Lenora Lapidus	0.17	285.00	48.45
3/26/2003	3:26 AM	Meeting	0.00	T@3	
WIP		King Chef	0.00		
Discuss case with J Amett Lee			0.00		
16723	TIME	Lenora Lapidus	0.60	285.00	171.00
3/27/2003	3:00 AM	review	0.00	T@3	
WIP		King Chef	0.00		
Review, edit, co-counsel agreement, retainer agreement			0.00		
16720	TIME	Lenora Lapidus	0.17	285.00	48.45
4/1/2003	3:26 AM	E-mail corr.	0.00	T@3	
WIP		King Chef	0.00		
Review and respond to email regarding King Chef 1, corporate entities			0.00		
16719	TIME	Lenora Lapidus	0.17	285.00	48.45
4/2/2003	3:26 AM	E-mail corr.	0.00	T@3	
WIP		King Chef	0.00		
Review and respond to email regarding cooperating attorney			0.00		

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Slip ID	Dates and Time	Attorney	Units	Rate	Slip Value
	Posting Status	Activity	DNB Time	Rate Info	
	Description	Client Reference	Est. Time	Bill Status	
16718	TIME 4/4/2003 3:30 AM WIP Review email regarding cooperating attorney	Lenora Lapidus E-mail corr. King Chef	0.10 0.00 0.00 0.00	285.00 T@3	28.50
16717	TIME 4/7/2003 3:30 AM WIP Review email regarding cooperating attorney	Lenora Lapidus E-mail corr. King Chef	0.10 0.00 0.00 0.00	285.00 T@3	28.50
16716	TIME 4/14/2003 3:30 AM WIP Review email regarding cooperating attorney	Lenora Lapidus E-mail corr. King Chef	0.10 0.00 0.00 0.00	285.00 T@3	28.50
16725	TIME 4/14/2003 3:26 AM WIP Discuss public policy argument with J. Arnett Lee	Lenora Lapidus Meeting King Chef	0.17 0.00 0.00 0.00	285.00 T@3	48.45
16726	TIME 4/17/2003 2:30 AM WIP Edit complaint	Lenora Lapidus Drafting King Chef	1.10 0.00 0.00 0.00	285.00 T@3	313.50
16715	TIME 4/24/2003 3:30 AM WIP Review and respond to email regarding cooperating attorney	Lenora Lapidus E-mail corr. King Chef	0.10 0.00 0.00 0.00	285.00 T@3	28.50
16727	TIME 4/24/2003 3:30 AM WIP Meeting with JAL regarding cooperating attorney	Lenora Lapidus Meeting King Chef	0.10 0.00 0.00 0.00	285.00 T@3	28.50
16713	TIME 4/25/2003 3:30 AM WIP Review and respond to email regarding co-counsel, complaint	Lenora Lapidus Email correspo King Chef	0.10 0.00 0.00 0.00	285.00 T@3	28.50

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Slip ID	Dates and Time	Attorney	Units	Rate	Slip Value
	Posting Status	Activity	DNB Time	Rate Info	
	Description	Client	Est. Time	Bill Status	
16714	TIME 4/25/2003 2:36 AM WIP Edit draft complaint	Lenora Lapidus Drafting King Chef	1.00 0.00 0.00 0.00	285.00 T@3	285.00
16711	TIME 5/6/2003 3:25 AM WIP Edit and send out conflicts check	Lenora Lapidus Drafting King Chef	0.18 0.00 0.00 0.00	285.00 T@3	51.30
16712	TIME 5/6/2003 3:29 AM WIP Review and respond to email regarding: public policy, conflicts check	Lenora Lapidus Email correspo King Chef	0.12 0.00 0.00 0.00	285.00 T@3	34.20
16728	TIME 5/8/2003 3:28 AM WIP Meeting with JAL regarding filing	Lenora Lapidus Meeting King Chef	0.13 0.00 0.00 0.00	285.00 T@3	37.05
16710	TIME 5/9/2003 3:30 AM WIP Review and respond to email regarding co-counsel	Lenora Lapidus E-mail corr. King Chef	0.10 0.00 0.00 0.00	285.00 T@3	28.50
16729	TIME 5/12/2003 3:15 AM WIP Meeting with JAL regarding forum, revisions to complaint	Lenora Lapidus Meeting King Chef	0.35 0.00 0.00 0.00	285.00 T@3	99.75
16709	TIME 5/12/2003 3:15 AM WIP Review and respond to email regarding consent forms, costs and fees, complaint	Lenora Lapidus Email correspo King Chef	0.25 0.00 0.00 0.00	285.00 T@3	71.25
16708	TIME 5/13/2003 3:00 AM WIP Edit retainer, consent forms	Lenora Lapidus Drafting King Chef	0.50 0.00 0.00 0.00	285.00 T@3	142.50
16707	TIME 5/13/2003 2:00 AM WIP Review and respond to email regarding	Lenora Lapidus Email correspo King Chef	1.00 0.00 0.00 0.00	285.00 T@3	285.00

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Slip ID		Attorney	Units	Rate	Slip Value
Dates and Time		Activity	DNB Time	Rate Info	
Posting Status		Client	Est. Time	Bill Status	
Description		Reference	Variance		
retainer, complaint, forum, public policy, damages					
16706	TIME 5/14/2003 WIP	Lenora Lapidus Drafting King Chef	1.00 0.00 0.00 0.00	285.00 T@3	285.00
	Edit retainer, co-counsel agreement				
16705	TIME 5/14/2003 WIP	Lenora Lapidus Drafting King Chef	0.75 0.00 0.00 0.00	285.00 T@3	213.75
	Edit revised complaint				
16704	TIME 5/14/2003 WIP	Lenora Lapidus Email correspo King Chef	0.75 0.00 0.00 0.00	285.00 T@3	213.75
	Review and respond to email regarding revised complaint, co-counsel agreement, forum				
16702	TIME 5/15/2003 WIP	Lenora Lapidus Email correspo King Chef	1.00 0.00 0.00 0.00	285.00 T@3	285.00
	Review and respond to email regarding complaint, forum, co-counsel arrangement, meeting with plaintiffs, FLSA				
16701	TIME 5/16/2003 WIP	Lenora Lapidus Drafting King Chef	0.50 0.00 0.50 0.00	285.00 T@3	142.50
	Review proposed edits to complaint				
16730	TIME 5/16/2003 WIP	Lenora Lapidus Meeting King Chef	0.08 0.00 0.00 0.00	285.00 T@3	22.80
	Meeting with JAL regarding case				
16699	TIME 5/19/2003 WIP	Lenora Lapidus Email correspo King Chef	0.50 0.00 0.50 0.00	285.00 T@3	142.50
	Review and respond to email regarding revised draft complaint, legal theories - discrimination, breach of contract, preliminary statement, statute of limitations, summonses, jury trial, plaintiffs, civil cover sheet, filing, addresses, wages/tips, ethnicity, dol investigation,				

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Slip ID		Attorney	Units	Rate	Slip Value
Dates and Time		Activity	DNB Time	Rate Info	
Posting Status		Client	Est. Time	Bill Status	
Description		Reference	Variance		
16700	TIME 5/19/2003 11:30 AM	Lenora Lapidus Drafting King Chef	1.00 0.00 0.00 0.00	285.00 T@3	285.00
	WIP				
	Review suggested edits, and edit draft complaint				
16731	TIME 5/19/2003 2:50 AM	Lenora Lapidus Meeting King Chef	0.77 0.00 0.00 0.00	285.00 T@3	219.45
	WIP				
	Meeting with JAL regarding case update				
16698	TIME 5/20/2003 12:00 PM	Lenora Lapidus Drafting King Chef	1.00 0.00 0.00 0.00	285.00 T@3	285.00
	WIP				
	Edit complaint				
16732	TIME 5/22/2003 3:00 AM	Lenora Lapidus Meeting King Chef	0.60 0.00 0.00 0.00	285.00 T@3	171.00
	WIP				
	Meeting with JAL regarding complaint, CSW concerns				
16697	TIME 5/29/2003 12:00 PM	Lenora Lapidus Email correspo King Chef	0.17 0.00 0.00 0.00	285.00 T@3	48.45
	WIP				
	Review and respond to email regarding summons, assignment to judge Hayden				
16696	TIME 6/3/2003 12:00 PM	Lenora Lapidus Telephone King Chef	0.10 0.00 0.00 0.00	285.00 T@3	28.50
	WIP				
	Tct with Wing at Chinese Staff				
16695	TIME 6/3/2003 12:00 PM	Lenora Lapidus Email correspo King Chef	0.17 0.00 0.00 0.00	285.00 T@3	48.45
	WIP				
	Review and respond to email regarding service, aliases, addresses				
16694	TIME 6/4/2003	Lenora Lapidus Email correspo King Chef	0.25 0.00 0.25 0.00	285.00 T@3	71.25
	WIP				
	Review and respond to email regarding service, address, corporate names, new corporate entity				

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Slip ID	Dates and Time	Attorney	Units	Rate	Slip Value
	Posting Status	Activity	DNB Time	Rate Info	
	Description	Client	Est. Time	Bill Status	
16693	TIME 6/5/2003 12:00 PM WIP Review D & B Information Report	Lenora Lapidus review King Chef	0.25 0.00 0.00 0.00	285.00 T@3	71.25
16692	TIME 6/5/2003 12:00 PM WIP Review and respond to email regarding service, corporate filings, doing business as	Lenora Lapidus Email correspo King Chef	0.42 0.00 0.00 0.00	285.00 T@3	119.70
16284	TIME 6/9/2003 11:30 AM WIP Tct w/co-counsel	Lenora Lapidus Telephone King Chef	1.12 0.00 0.00 0.00	285.00 T@3	319.20
16691	TIME 6/9/2003 12:00 PM WIP Review and respond to email regarding service, skip traces, visit to restaurant	Lenora Lapidus Email correspo King Chef	0.25 0.00 0.00 0.00	285.00 T@3	71.25
16690	TIME 6/10/2003 12:08 PM WIP Review and respond to email regarding co-counsel agreement, service	Lenora Lapidus Email correspo King Chef	0.10 0.00 0.10 0.00	285.00 T@3	28.50
16689	TIME 6/11/2003 12:08 PM WIP Review and respond to email regarding service and asset search	Lenora Lapidus Email correspo King Chef	0.10 0.00 0.10 0.00	285.00 T@3	28.50
16688	TIME 6/12/2003 12:06 PM WIP Review and respond to email regarding service	Lenora Lapidus Email correspo King Chef	0.03 0.00 0.00 0.00	285.00 T@3	8.55
16687	TIME 6/13/2003 12:00 PM WIP Review and respond to email regarding service	Lenora Lapidus Email correspo King Chef	0.10 0.00 0.00 0.00	285.00 T@3	28.50

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Slip ID		Attorney	Units	Rate	Slip Value
Dates and Time		Activity	DNB Time	Rate Info	
Posting Status		Client	Est. Time	Bill Status	
Description		Reference	Variance		
16686	TIME	Lenora Lapidus	0.10	285.00	28.50
6/17/2003		Email correspo	0.00	T@3	
WIP		King Chef	0.10		
Review and respond to email regarding: service			0.00		
16685	TIME	Lenora Lapidus	0.10	285.00	28.50
6/18/2003		Email correspo	0.00	T@3	
WIP		King Chef	0.10		
Review and respond to email regarding: service			0.00		
16684	TIME	Lenora Lapidus	0.10	285.00	28.50
6/19/2003	12:00 PM	Email correspo	0.00	T@3	
WIP		King Chef	0.00		
Review and respond to email regarding: pro hac vice motion			0.00		
16681	TIME	Lenora Lapidus	0.25	285.00	71.25
7/2/2003	12:00 PM	Drafting	0.00		
WIP		King Chef	0.00		
Edit pro hac vice motion, discuss with J. Amett Lee			0.00		
16680	TIME	Lenora Lapidus	0.13	300.00	39.00
7/2/2003		Email correspo	0.00	T@4	
WIP		King Chef	0.13		
Review and respond to email regarding: default			0.00		
16679	TIME	Lenora Lapidus	0.50	300.00	150.00
7/3/2003	12:00 PM	Email correspo	0.00	T@4	
WIP		King Chef	0.00		
Review and respond to email regarding: default, order from judge,			0.00		
16678	TIME	Lenora Lapidus	0.50	300.00	150.00
7/4/2003	12:00 PM	review	0.00	T@4	
WIP		King Chef	0.00		
Review and edit draft default papers			0.00		
16677	TIME	Lenora Lapidus	0.33	300.00	99.00
7/7/2003	12:00 PM	Email correspo	0.00	T@4	
WIP		King Chef	0.00		
Review and respond to email regarding: service, default, damages			0.00		

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Slip ID	Dates and Time	Posting Status	Description	Attorney	Units	Rate	Slip Value
				Activity	DNB Time	Rate Info	
				Client Reference	Est. Time	Bill Status	
16676	TIME			Lenora Lapidus	0.20	300.00	60.00
7/9/2003	12:00 PM			Email correspo	0.00	T@4	
WIP				King Chef	0.00		
			Review and respond to email regarding: service, default, skip trace		0.00		
16675	TIME			Lenora Lapidus	0.20	300.00	60.00
7/9/2003	12:00 PM			Email correspo	0.00	T@4	
WIP				King Chef	0.00		
			Review and respond to emails regarding: discrimination and public policy damages		0.00		
16674	TIME			Lenora Lapidus	0.17	300.00	51.00
7/10/2003	2:14 PM			Legal	0.00	T@4	
WIP				King Chef	0.00		
			Review and respond to email regarding: pro hac vice, affidavit of legal services, default, asset search,		0.00		
16558	TIME			Lenora Lapidus	0.38	300.00	114.00
7/10/2003	11:37 AM			Motion Practice	0.00	T@4	
WIP				King Chef	0.00		
			Review and edit pro hac vice motion papers; default judgment papers; correspondence regarding: next steps		0.00		
16673	TIME	7/16/2003		Lenora Lapidus	0.02	300.00	6.00
7/11/2003	2:13 PM			Legal	0.00	T@4	
WIP				King Chef	0.25		
			Review and respond to emails regarding default		(0.23)		
16672	TIME			Lenora Lapidus	0.11	300.00	33.00
7/16/2003	2:06 PM			Legal	0.00	T@4	
WIP				King Chef	0.00		
			Review and respond to emails regarding: motion for default, costs, damages, filing, service		0.00		
16671	TIME			Lenora Lapidus	0.00	300.00	0.00
7/16/2003	2:06 PM			Fees and Costs	0.00	T@4	
WIP				King Chef	0.00		
			Prepare fee affidavit entries		0.00		

7/16/2003  
5:14 PMACLU  
Slip Listing

Page 9

Slip ID	Attorney	Units	Rate	Slip Value
				Dates and Time
Posting Status	Client	Est. Time	Bill Status	
Description	Reference	Variance		
16733	TIME	Lenora Lapidus	2.00	300.00
7/16/2003	1:00 AM	Drafting	0.00	T@4
WIP	King Chef	0.00		
Prepare hours for fee affidavit, sign papers		0.00		
<hr/>				
<b>Grand Total</b>				
	Billable	25.41		7309.95
	Unbillable	0.00		0.00
	<b>Total</b>	<b>25.41</b>		<b>7309.95</b>
<hr/>				



**Disbursements For Client/Matter/ Date (Base)**

Lowenstein Sand

For Period From 5/1/2003 To 7/14/2003

Client Id / Matter	Atty Id	Disb Code	Date	Units	Amount	Narrative
15842	Liu, Mei Ying					
	2	King Chef Buffet				
1057	TELEN		5/16/2003	0	0.70	Ext: 01492, State called: NY, Num. Dialed: 2125197816
	TELEN		5/16/2003	0	0.35	Ext: 01492, State called: NY, Num. Dialed: 7188126178
	TELEN		5/16/2003	0	2.89	
	TELEN		5/16/2003	0	0.35	Ext: 01492, State called: NY, Num. Dialed: 2125197816
	TELEN		5/22/2003	0	0.70	Ext: 01492, State called: NY, Num. Dialed: 2125197816
	COPYIN		5/22/2003	6	0.72	
	COPYIN		5/22/2003	1	0.12	
	COPYIN		5/22/2003	155	18.60	
	COPYIN		5/22/2003	10	1.20	
	COPYIN		5/22/2003	8	0.96	
	COPYIN		5/22/2003	3	0.36	
	TELEN		5/22/2003	0	1.05	Ext: 01492, State called: NY, Num. Dialed: 2125197816
	TELEN		5/22/2003	0	2.45	Ext: 01492, State called: NY, Num. Dialed: 2125197816
	MSGEX		5/22/2003	0	75.00	VENDOR: 911Counter, Inc.; INVOICE#: 0101; DATE: 6/3/2003/Clerk, USDC-Newark, NJ
	TELEN		5/22/2003	0	3.50	Ext: 01492, State called: NY, Num. Dialed: 2125197816
	TELEN		5/22/2003	0	2.80	Ext: 01492, State called: NY, Num. Dialed: 2125197816
	FAX		5/22/2003	3	0.90	
	FILE		5/22/2003	0	150.00	PAYEE: Clerk, U.S.District Court; REQUEST#: 158259; DATE: 5/22/2003. - Filing
	TELEN		5/22/2003	0	0.70	Ext: 01492, State called: NY, Num. Dialed: 2125197816
	TELEN		5/27/2003	0	0.70	Ext: 01492, State called: NY, Num. Dialed: 2125197816
	COPYIN		5/29/2003	376	45.12	
	COPYIN		5/29/2003	22	2.64	
	FEDX		5/29/2003	0	8.44	VENDOR: Federal Express Corp.; INVOICE#: 052903; DATE: 5/29/2003
	POSTIN		5/29/2003	0	7.00	
	FEDX		5/29/2003	0	1.40	
	MSGEX		5/29/2003	0	25.25	VENDOR: Federal Express Corp.; INVOICE#: 4-721-67859; DATE: 6/9/2003
	TELEN		5/3/2003	0	0.30	VENDOR: Flash Systems,Inc; INVOICE#: 106401; DATE: 6/1/2003/Clerk, USDC-Newark, NJ
	COPYIN		5/4/2003	110	13.20	Ext: 01492, State called: NY, Num. Dialed: 2125492689
	COPYIN		5/4/2003	34	4.08	
	DD&B		6/5/2003	0	40.40	Business information report - King Chef Buffet
	TELEN		6/5/2003	0	0.35	Ext: 01492, State called: NY, Num. Dialed: 2125197816
	FAX		6/6/2003	3	0.90	
	FAX		6/6/2003	3	0.90	
	TELEN		6/6/2003	0	2.10	Ext: 01492, State called: NY, Num. Dialed: 2125197816
	MSGEX		6/6/2003	0	42.00	VENDOR: Robert Belko; INVOICE#: 104507; DATE: 6/8/2003/Town clerk's office-Wayne, NJ

Client Id / Matte	Atty Id	Disb Code	Date	Units	Amount	Narrative
15842	Liu, Mei Ying					
	1057	SHRIFT	6/9/2003	0	150.00	VENDOR: J & K Associates Inc; INVOICE#: 5127-5132; DATE: 6/9/2003
		FEDX	6/9/2003	0	6.28	VENDOR: Federal Express Corp.; INVOICE#: 060903; DATE: 6/9/2003
		COPVN	6/9/2003	172	20.64	
		COPVN	6/9/2003	16	1.92	
		FEDX	6/9/2003	0	1.40	VENDOR: Federal Express Corp.; INVOICE#: 4-768-51458; DATE: 6/23/2003
		COPVN	6/10/2003	226	27.12	
		COPVN	6/10/2003	12	1.44	
		TELEN	6/11/2003	0	1.75	Ext: 01492, State called: NY, Num. Dialed: 2125197816
		COPVN	6/11/2003	104	12.48	
		POSTN	6/11/2003	0	5.25	
		COPVN	6/12/2003	313	37.56	
		MSGEX	6/12/2003	0	38.00	VENDOR: Flash Systems Inc; INVOICE# 104622; DATE: 6/15/2003 USDC-Newark, NJ
		FEDX	6/12/2003	0	2.26	VENDOR: Federal Express Corp.; INVOICE# 4-768-51458; DATE: 6/23/2003
		FILE	6/12/2003	0	10.50	PAYEE: U.S. District Court of NJ; REQUEST#: 159007; DATE: 6/12/2003. Court fees for document retrieval
		FEDX	6/12/2003	0	8.32	VENDOR: Federal Express Corp.; INVOICE# 061203; DATE: 6/12/2003
		POSTN	6/13/2003	0	6.63	
		COPVN	6/13/2003	7	0.84	
		COPVN	6/13/2003	5	0.60	
		COPVN	6/13/2003	20	2.40	
		COPVN	6/13/2003	31	3.72	
		COPVN	6/13/2003	2	0.24	
		COPVN	6/13/2003	3	0.36	
		TELEN	6/16/2003	0	2.10	
		POSTN	6/19/2003	0	4.47	
		COPVN	6/19/2003	92	11.04	Ext: 01492, State called: NY, Num. Dialed: 3474393143
		COPVN	6/19/2003	8	0.96	
		LEX	6/27/2003	0	30.76	N KUMAR 0-04-05
		COPVN	6/30/2003	46	5.52	
		LEX	7/1/2003	0	388.26	N KUMAR 0-32-05
		FAX	7/1/2003	4	1.20	
		COPVN	7/1/2003	18	2.16	
		FAX	7/1/2003	11	3.30	
		FAX	7/1/2003	2	0.60	
		FAX	7/3/2003	2	0.60	
		FEDX	7/8/2003	0	9.15	VENDOR: Federal Express Corp.; INVOICE# 070803; DATE: 7/8/2003
		FEDX	7/8/2003	0	7.79	VENDOR: Federal Express Corp.; INVOICE# 070803; DATE: 7/8/2003
		POSTN	7/8/2003	0	8.70	
		COPVN	7/8/2003	464	55.68	
		COPVN	7/8/2003	8	0.96	
		COPVN	7/9/2003	16	1.92	

Client Id / Matte Atty Id	Disb Code	Date	Units	Amount	Narrative
15842	Liu, Mei Ying				
	1057	TELEN	7/11/2003	0	3.15
		COPYIN	7/14/2003	74	<u>8.88</u>
					Ext: 01492, State called: NY, Num. Dialed: 212519816
		Total For Matter	2	<u>1,345.04</u>	
		Total For Client	15842	1,345.04	



Ed Barocas  
Time for King Chef

<u>Date</u>	<u>Hours</u>	<u>Amount</u>	<u>Description</u>
4/3	1.8	\$360	Review facts of case and compose and send e-mail to Legal Committee for approval of case
4/14	.5	\$100	Call w/ Alix Rubin re: serving as cooperating atty on case; e-mail JAP re: same
5/12	.3	\$60	E-mails w/ AR & JAR re: costs in case
5/13	1.2	\$240	Call w/ Jen Ching & e-mails re: potential claims and filing/jurisdiction issues
5/14	1.3	\$260	Conf. call w/ JAR, AR, JC & AR & e-mails re: potential claims & filing
5/20	.6	\$120	Review complaint
6/4	.2	\$40	Review e-mails re: service issues
6/9	.4	\$80	Review/send e-mails re: amending complaint/service issues
6/10	.2	\$40	Same
Totals:	6.5	\$1,300	



Amanda Couture  
 Summer Associate  
 Women's Rights Project, ACLU

Hours for Liu v. Oriental Buffet  
 a/k/a "King Chef"

date	topic	case	time	minutes	hours
5.12.03	review of complaint	King Chef	11-11:40	40	0.67
5.13.03	statute of limitations research	King Chef	11:10-11:40	30	0.5
5.13.03	researching addresses for service	King Chef	1:30-2:00	30	0.5
5.14.03	researching NJ statute of certification of a question	King Chef	12:10-12:30	20	0.33
5.14.03	conference call	King Chef	3:00-3:50	50	0.83
5.15.03	background research for public policy argument	King Chef	2:50-4:30	100	1.67
5.19.03	public policy research	King Chef	9:45-10:20	35	0.58
5.19.03	statute of limitations research	King Chef	10:20-10:35	15	0.25
5.19.03	threat and assault research	King Chef	11:25-12:10	45	0.75
5.20.03	memo on CEPA and statute of limitations	King Chef	2:00-5:40	220	3.67
5.21.03	research on assault statutes in New Jersey	King Chef	1:05-2:10	65	1.08
5.21.03	statute of limitations research	King Chef	2:15-3:30	75	1.25
5.23.03	new cause of action research on employment agencies in NY	King Chef	9:30-12:15	165	2.75
5.23.03	new cause of action research on minimum wage act in NY	King Chef	12:35-1:45	70	1.17
6.9.03	conference call	King Chef	11:30-12:30	60	1
6.11.03	damages spreadsheet	King Chef	2:20-5:50	210	3.5
6.12.03	damages spreadsheet, including NJ statute of limitations research	King Chef	9:45-10:50	65	1.08
6.13.03	damages spreadsheet, equal protection act variations	King Chef	9:40-10:55	65	1.08
6.13.03	public policy argument	King Chef	11:05-11:40	35	0.58
6.13.03	public policy argument	King Chef	11:50-12:25	35	0.58
6.13.03	public policy argument background reading	King Chef	1:30-3:40	130	2.17
6.16.03	public policy argument	King Chef	10-12:35	155	2.58
6.16.03	public policy argument	King Chef	1:10-2	50	0.83

Amanda Couture  
Summer Associate  
Women's Rights Project, ACLU

Hours for <u>Liu v. Oriental Buffet</u> a/k/a "King Chef"					
6.16.03	public policy argument	King Chef	2:30-3:50	80	1.33
6.16.04	public policy argument	King Chef	4:05-5:25	80	1.33
6.17.03	public policy argument/ federal	King Chef	9:50-12:20	150	2.5
6.17.03	public policy argument/ federal	King Chef	1:50-4:00	130	2.17
6.18.03	damages spreadsheet revision	King Chef	3:50-5:10	80	1.33
6.20.03	damages spreadsheet final revisions	King Chef	4:30-5:30	60	1
			total: 2345	total hours: 39.08	



# WorkLoad For Client / Matter By Time Entry (Base)

Lowenstein Sandler

For Period From 5/1/2003 To 7/14/2003

Client	Date	Timekeeper	Hours	Amount	Narrative
<b>Client 15842 Liu, Mel Ying</b>					
<b>Matter 2 King Chef Buffet</b>					
5/8/2003	2424	Rubin, Alix R.	0.20	45.00	Telephone conference with J. Lee of American Civil Liberties Union re: status of filing complaint against King Chef Buffet and Pro Bono Committee for approval of representation
5/9/2003	2424	Rubin, Alix R.	2.20	495.00	Prepare formal request to Pro Bono Committee for approval of American Civil Liberties Union of New Jersey Foundation employment discrimination case against King Chef Buffet
5/12/2003	2424	Rubin, Alix R.	2.30	517.50	Prepare Pro Bono Intake Data form for King Chef Buffet case; conference with P. Whalen re: same and re: where to file; e-mail correspondence with J. Lee re: New Jersey public policy claim, possibility of filing in state court, and estimated costs
5/13/2003	2424	Rubin, Alix R.	2.10	472.50	E-mail correspondence with J. Lee, L. Lapidus and E. Barocas re: advisability of filing state court; conference with J. Werner re: same; review removal statutes and rule
5/13/2003	2302	Sadati, Michele M. Contreras	0.50	102.50	Meeting with A. Rubin re: background of matter and complaint
5/14/2003	2424	Rubin, Alix R.	1.60	360.00	Telephone conference with ACLU attorneys re: whether to file in state or federal court; mail correspondence with ACLU and firm attorneys re: judges in Passaic County and Judges K. Hayden and R. Hedges; review proposed co-counsel agreement; e-mail J. Lee re: same
5/15/2003	1079	Wilkinson, Richard D.	1.00	335.00	Review three documents on new case for A. Rubin and discuss same with A. Rubin; review and discuss press release issues
5/15/2003	2424	Rubin, Alix R.	3.90	877.50	Continue e-mail correspondence with ACLU attorneys re: whether to file in state or federal court; potential immigration issues and client meeting; telephone call to District Court re: case assignments; conference with R. Wilkinson re: complaint and q uote for press release; draft quote for press release; e-mail J. Lee R. Wilkinson's comments to complaint; review retainer agreement and revised co-counsel agreement; review National Employment Law Project article on current law regarding undocumented Telephone conference with J. Lee, R. Alleyne, W. Chen and clients re: complaint and press coverage of filing; e-mail correspondence with ACLU attorneys re: revised complaint and jury trial; revise statement for press release; attend to preparation of client and matter intake memoranda
5/16/2003	2424	Rubin, Alix R.	3.00	675.00	Review and revise draft complaint; e-mail and fax comments to J. Lee; e-mail correspondence with ACLU attorneys re: status of complaint and filing date
5/19/2003	2424	Rubin, Alix R.	3.50	737.50	Review newly revised Complaint; conference with M. Sadati re: same; e-mail comm re: same to J. Lee
5/20/2003	2424	Rubin, Alix R.	1.40	315.00	Telephone conference with J. Lee re: filing and service of complaint; review final revised press release; e-mail comments re: same to E. Whitfield; draft letter to Court filing
5/21/2003	2424	Rubin, Alix R.	2.80	630.00	Telephone conference with J. Lee re: filing and service of complaint; review final revised draft press release; e-mail R. Alleyne re: same; telephone conference with J. Lee re: revisions to complaint
5/22/2003	2424	Rubin, Alix R.	3.10	697.50	Revise summonses and civil cover sheet; attend to filing of complaint; review revised draft press release; e-mail R. Alleyne re: same; telephone conference with J. Lee re: discuss complaint with A. Rubin; attention to editing complaint
5/22/2003	2302	Sadati, Michele M. Contreras	3.50	717.50	E-mail E. Whitfield and R. Alleyne re: contact at Reuters
5/23/2003	2424	Rubin, Alix R.	0.10	22.50	

Client	Date	Timekeeper	Hours	Amount	Narrative
15842 Liu, Mei Ying					
5/27/2003	2424	Rubin, Alix R.	1.00	225.00	Review CourtHouse News Service report re: filing of case; e-mail correspondence w/ ACLU attorneys re: same; forward complaint to P. Whalen for review; telephone conferences with court clerks re: issuance of summonses
5/28/2003	1508	Whalen, Patrick J.	0.40	90.00	Receive, review and analyze class action complaint
5/29/2003	2424	Rubin, Alix R.	1.90	427.50	Telephone conference with court clerk re: issuance of summonses; attend to pick up same; telephone call to J&K Associates re: service on defendants; letter to J&K Associates re: same, enclosing summonses and complaint; e-mail ACLU attorneys re: status of service
5/30/2003	2424	Rubin, Alix R.	0.20	45.00	Telephone call to J&K Associates re: status of service; conference with P. Whalen re same
6/2/2003	2424	Rubin, Alix R.	1.30	292.50	Telephone call to J&K Associates re: status of service on defendants; e-mail correspondence with ACLU re: same; telephone conference with A. Camacho of Her News re: background of case; review Herald News article re: King Chef I case
6/3/2003	2424	Rubin, Alix R.	1.60	360.00	Telephone conference with J&K Associates re: service; e-mail ACLU re: same; telephone call to A. Camacho re: same
6/4/2003	2424	Rubin, Alix R.	2.40	540.00	Communications with ACLU, process server and A. Camacho re: service on defendants and when to issue press release; prepare additional copies of summonses and complaint for service
6/5/2003	2424	Rubin, Alix R.	1.60	360.00	Telephone conference with J. Lee re: status of service and new corporate ownership; attend to various corporate and individual searches of defendants; communications w/ ACLU, process server and A. Camacho re: service
6/5/2003	2679	Taggart, Katherine E	0.80	64.00	Research on individuals and companies (Rubin)
6/6/2003	2424	Rubin, Alix R.	3.30	742.50	E-mail correspondence with ACLU attorneys re: status of service and corporate searches; telephone conferences with J. Lee, J. Cafone and J&K Associates re: same; obtain restaurant license applications for King Chef and Metropolitan Buffet; forward me to J. Lee; review ChoicePoint searches
6/6/2003	2679	Taggart, Katherine E	0.50	40.00	Additional research on individuals and companies - public records, etc. (Rubin)
6/9/2003	2424	Rubin, Alix R.	10.90	2,452.50	Telephone conference with ACLU attorneys re: amending complaint; service on defendants and when to issue press release; review Choice Point searches for home addresses and aliases of defendants; forward same to J. Lee; review and revise amended complaint; forward additional copies of complaint to J&K Associates for service on defendants at their home addresses; telephone call to court clerk re: how quickly new summonses can be issued; communicate with ACLU attorneys re: same; conference with P. Whalen, Patrick J.
6/9/2003	1508	Whalen, Patrick J.	1.30	292.50	Review and commence detailed analysis of the federal complaint that has been filed; discuss service problems and strategy with the press and A. Camacho on this case and strategy with the press and A. Camacho on this case
6/9/2003	2679	Taggart, Katherine E	0.30	24.00	Research on additional individuals (Rubin)
6/10/2003	2424	Rubin, Alix R.	4.10	922.50	Continue reviewing and revising amended complaint; communicate with ACLU attorney re: same and re: service; telephone call to J&K Associates re: service; attend to preparation of summonses; attend to filing of amended complaint; forward amended complaint to A. Camacho; telephone conference with A. Camacho re: same
6/10/2003	1508	Whalen, Patrick J.	0.20	45.00	Strategy discussion with A. Rubin
6/10/2003	1533	Crawford, Thomas	1.80	162.00	Research re: docket in <i>Wu v. Oriental Buffet, Inc.</i> , civil action no. 00-4482; coordinate with federal district court clerk's office re: timing and arrangements for filing complaint Liu and Chen v. Oriental Buffet, Inc., civil action no. 03-2406 pa
		r A. Rubin			

Client	Date	Timekeeper	Hours	Amount	Narrative
15842 Liu, Mei Ying					
6/11/2003 1508	Whalen, Patrick J.		2.00	450.00	Various discussions with A. Rubin re: the amended complaint, additional causes of action and additional potential defendants; discuss press relations with A. Rubin and conference call with A. Camacho, follow up to Bruce Rosen and the Bergen Records and the Star Ledger; review and approve of press release; complete review and analysis of the amended complaint
6/11/2003 1533	Crawford, Thomas		2.70	243.00	Travel to Federal District Court in Newark and file Summons and Complaint in Liu and Chen v. Oriental Buffet Inc., civil action no. 03-2406; prepare form requesting from clerk's office relevant pleadings in Wu v. Oriental Buffet, Inc., civil action no. 00-4482 re: location of defendants for service per A. Rubin
6/11/2003 2424	Rubin, Alix R.		1.70	382.50	Telephone calls to R. Alleyne and L. Camacho re: filing of amended complaint; e-mail ACLU attorneys re: same; conference with P. Whalen re: potential consumer fraud or RICO claims, press coverage, and asset search of defendants; e-mail ACLU re: same Receipt and review of sealed Summons; forward same to J&K Associates with instructions for service; telephone call to J&K Associates re: same; e-mail ACLU attorneys re: same; telephone conference with R. Ratish of Bergen Record and P. Whalen re: ca
6/12/2003 1508	Whalen, Patrick J.		0.70	157.50	SE; review Choice Point searches on A. Sung and Q. Chen
6/13/2003 1508	Whalen, Patrick J.		0.50	112.50	Various strategy discussions with A. Rubin re: amending the complaint and third party subpoena on employment agency; conversations with The Bergen Record, receive and review articles from the Herald News and the Bergen Record; research the T Visa issue identified by A. Doumas; strategy discussions with A. Rubin
6/13/2003 2424	Rubin, Alix R.		1.90	427.50	Receipt and review of articles on case in Herald News and The Record; forward same to ACLU attorneys; conference with P. Whalen re: same; telephone conference with J&K Associates re: service; e-mail correspondence with J. Lee re: trafficking element of case; conference with P. Whalen re: same
6/16/2003 2424	Rubin, Alix R.		1.10	247.50	Communicate with W. Chen, J&K Associates and ACLU attorneys re: status of service; assign research re: potential consumer fraud claim to summer associate
6/17/2003 2424	Rubin, Alix R.		0.50	112.50	Telephone call to J&K Associates re: status of service on defendants; e-mail ACLU
6/17/2003 1508	Whalen, Patrick J.		0.40	90.00	Initial discovery strategy issues
6/18/2003 2424	Rubin, Alix R.		0.40	90.00	E-mail ACLU attorneys re: various options for service on defendants
6/19/2003 2424	Rubin, Alix R.		0.90	202.50	Attorney's re: same and re: filing proof of service
6/20/2003 3066	Kumar, Nidhi		0.60	72.00	Review various e-memos and phone conversation with A. Rubin re: the service and t
6/20/2003 3066	Kumar, Nidhi		0.40	48.00	Initial discovery strategy issues
6/20/2003 3066	Kumar, Nidhi		1.00	225.00	E-mail ACLU attorneys re: various options for service on defendants
6/24/2003 2424	Rubin, Alix R.		1.00	225.00	Prepare affidavit of service; attend to filing of same
6/25/2003 3066	Kumar, Nidhi		0.60	72.00	Research New Jersey Consumer Fraud Act to see whether statute applicable to landlord relationship
6/25/2003 3066	Kumar, Nidhi		1.00	120.00	Begin researching New Jersey Consumer Fraud Act
6/25/2003 1508	Whalen, Patrick J.		0.30	67.50	Telephone call to J&K Associates re: status of service; e-mail ACLU attorneys re: same
6/25/2003 2424	Rubin, Alix R.		0.70	157.50	Review memorandum re: clients' eligibility for T-1 visa; e-mail C. Stewart re: same
6/26/2003 2424	Rubin, Alix R.		0.10	22.50	Meet with P. Whalen and A. Rubin re: King Chef Buffet matter
6/26/2003 2424	Rubin, Alix R.		0.10	22.50	Research consumer fraud act
6/26/2003 2424	Rubin, Alix R.		0.10	22.50	Review various e-mails re: T Visa issues; brief strategy discussion with A. Rubin
6/26/2003 2424	Rubin, Alix R.		0.10	22.50	Conference with P. Whalen and N. Kumar re: research assignment on viability of a consumer fraud claim with respect to landlord-tenant relationship between clients and their employers; e-mail correspondence with ACLU attorneys re: T-1 visa issues
6/26/2003 2424	Rubin, Alix R.		0.10	22.50	E-mail N. Kumar re: article in New Jersey Law Journal re: recent cases interpreting T1 New Jersey Consumer Fraud Act

Client	Date	Timekeeper	Hours	Amount	Narrative
15842	Liu, Mei Ying				
6/27/2003	3066	Kumar, Nidhi	0.40	48.00	Read complaint filed on behalf of client-plaintiffs Liu and Chen against King Chef Buff
6/27/2003	3066	Kumar, Nidhi	0.30	36.00	Conduct research on causes of action of tenants against landlord under NJ Consumer Fraud Act
6/27/2003	2424	Rubin, Alix R.	0.10	22.50	Attend to discovery of forwarding address for apartment at 433 Totowa Road in Paterson
6/30/2003	3066	Kumar, Nidhi	0.20	24.00	Consult with A. Rubin re: memo on consumer fraud and real estate
6/30/2003	2424	Rubin, Alix R.	1.00	225.00	Letter to C. Shadden re: asset search; e-mail to J. Lee updating status; conference w/ N. Kumar re: consumer fraud research
6/30/2003	3066	Kumar, Nidhi	1.00	120.00	Begin outline for memo re: consumer fraud act
7/1/2003	3066	Kumar, Nidhi	7.00	840.00	Write memo re: consumer fraud act as relating to landlord-employer and tenant-employee identification or social security number, where available, and in which states to search bank accounts; telephone conference with J&K Associates re: service; rev
7/2/2003	1508	Whalen, Patrick J.	0.40	96.00	Review recent correspondence to Investigator doing assets search and person locator searches; discussion with A. Rubin
7/2/2003	2424	Rubin, Alix R.	2.00	500.00	E-mail correspondence with ACLU attorneys re: filing for entry of default and default judgment on original complaint; J. Lee's pro hac vice admission, and update on service and consumer fraud research; telephone call to Magistrate Judge P. Schwartz <sup>2</sup> ; C. Hambers re: requirements for pro hac vice admission; e-mail J. Lee samples of motor admission pro hac vice and of default pleadings; read New York Times article re: immigrant smuggling case
7/3/2003	1508	Whalen, Patrick J.	1.70	408.00	Review research memo re: potential RICO claims; review and analyze research memo summarizing the Consumer Fraud Act and its applicability to landlord tenant relationship and its applicability to the facts of this case; e-mails back and forth to summer associate and A. Rubin re: strategy; review e-mails re: service, motions for default and motions for default judgment and strategy re: same; research into asset search with ACLU attorney's re: moving for entry of default and default judgment; review and motions for default judgment with A. Rubin; review various service/default E-mail N. Kumar re: research on consumer fraud cause of action; e-mail correspondence with ACLU attorney's re: moving for entry of default and default judgment; review and motions for default judgment with A. Rubin; review various service/default strategy emails
7/7/2003	1508	Whalen, Patrick J.	0.60	144.00	Discuss strategy re: default judgment with A. Rubin; review various service/default strategy emails
7/7/2003	3066	Kumar, Nidhi	0.50	60.00	Review feedback from A. Rubin and P. Whalen on memo re: consumer fraud act
7/7/2003	2424	Rubin, Alix R.	1.10	275.00	Finalize papers requesting entry of default; e-mail correspondence with ACLU attorney re: conducting a skip trace on J. Ching and motion for default judgment
7/8/2003	2424	Rubin, Alix R.	0.80	200.00	Attend to filing of request for entry of default; e-mail correspondence with ACLU attorney re: same and re: amending the complaint
7/8/2003	1508	Whalen, Patrick J.	0.70	168.00	Further strategy discussions re: default and the need for a second amended complaint and the various causes of action
7/9/2003	3066	Kumar, Nidhi	4.00	480.00	Finalize memo re: consumer fraud and landlord-tenant relationships; research statute limitations on consumer fraud claim
7/9/2003	2424	Rubin, Alix R.	2.40	600.00	Review and revise default judgment papers; e-mail correspondence with ACLU attorney re: same and re: statute of limitations on RICO and Consumer Fraud Act claims
7/10/2003	2424	Rubin, Alix R.	3.40	850.00	Review and revise papers requesting admission pro hac vice of J. Lee; continue review default judgment papers; telephone conference with J&K Associates re: status of se on defendant; e-mail ACLU attorney's re: same

Client	Date	Timekeeper	Hours	Amount	Narrative
15842 Liu, Mei Ying					
7/11/2003 2424	Rubin, Alix R.	2.30	575.00		Telephone conference and e-mail correspondence with J. Lee re: default judgment papers and affidavit of legal services; receipt of additional asset search information; mail ACLU attorneys re: same; finalize pro hac vice papers; conference with P. Whalen re: jury trial
7/14/2003 1508	Whalen, Patrick J.	0.60	144.00		Strategy discussions with A. Rubin re: default and whether or not to have a jury trial
7/14/2003 2424	Rubin, Alix R.	1.40	350.00		Judge trial; e-mail back and forth to the team; resolve dispute with K. Lewis re: default judgment papers
Total For	Liu, Mei Ying	122.10	25,503.00		